

MacArthur, Jennifer

From: MacArthur, Jennifer
Sent: Wednesday, March 18, 2015 12:28 PM
To: Michelle Lee
Cc: 'Chapman, Karen'
Subject: RE: EPA Registry info

Great. Thanks for the update.

Jennifer MacArthur
Enforcement Office
Waste & Chemical Section
US EPA Region 9
75 Hawthorne Street (ENF-2-2)
San Francisco, CA 94105
(415) 972-3994

From: Michelle Lee [mailto:michelee@usc.edu]
Sent: Wednesday, March 18, 2015 11:27 AM
To: MacArthur, Jennifer
Cc: 'Chapman, Karen'
Subject: RE: EPA Registry info

Good morning Jennifer,

The letter I put together to respond to your request is being reviewed by the Norris Cancer Hospital Environmental Service Management. I will forward (email) the letter to you upon the completing of their review.

Michelle Lee, MSEM, CHMM
Environmental Compliance Manager
Environmental Health and Safety
323-864-3188 / michelee@usc.edu



From: MacArthur, Jennifer [mailto:MacArthur.Jennifer@epa.gov]
Sent: Wednesday, March 18, 2015 10:03 AM
To: Michelle Lee
Cc: 'Chapman, Karen'
Subject: RE: EPA Registry info

Michelle,

Just following up on a conversation we had last week. You mentioned that EPA's contractor (Tetrattech) said it was acceptable to use the Federal ID# you already have for the Norris Cancer Hospital. If you could provide me something in writing detailing the information Tetrattech provided to you, information on which ID number you will use to manifest hazardous waste offsite and which facilities will be covered under the ID number I can check to make sure it meets our regulations and hopefully close my file. If you have any questions don't hesitate to call or email.

Regards,

Jennifer MacArthur
Enforcement Office
Waste & Chemical Section
US EPA Region 9
75 Hawthorne Street (ENF-2-2)
San Francisco, CA 94105
(415) 972-3994

From: Michelle Lee [<mailto:michelee@usc.edu>]
Sent: Monday, March 09, 2015 6:06 PM
To: MacArthur, Jennifer; 'Chapman, Karen'; 'Vance, Robert'; 'Taylor, Gordon'
Cc: James Gibson; Anthony Rodriguez
Subject: RE: EPA Registry info

Hi Jennifer,

Thanks for your prompt response.

University of Southern California once looked into the Subpart K rule for a possible alternate hazardous waste management. We did not find it to be practical or useful for our mainly research and clinical laboratory settings, although we may be eligible for the alternate rule. Furthermore, I do not believe that California has accepted the federal rule yet.

I will speak to the contractor that handles issuing and updating federal ID for California facilities to seek out any possibility of extending our US EPA ID number (CAT000617597) to cover the Norris Cancer Hospital.

I will keep you updated.

Thanks and regards,

Michelle Lee, MSEM, CHMM
Environmental Compliance Manager
Environmental Health and Safety
323-864-3188 / michelee@usc.edu



From: MacArthur, Jennifer [<mailto:MacArthur.Jennifer@epa.gov>]
Sent: Monday, March 09, 2015 3:58 PM
To: Michelle Lee; 'Chapman, Karen'; 'Vance, Robert'; 'Taylor, Gordon'
Subject: RE: EPA Registry info

Michelle,

It may be possible to integrate hospital hazardous waste management into one university management with one consolidation facility regulated under Subpart K (alternative requirements for academic laboratories – 40 CFR 262.203) if you meet all of the eligibility requirements. If you are eligible and opt to manage your hazardous waste under Subpart K there are certain things you need to have in place (e.g. a laboratory management plan) and you still need to submit a Site Identification Form (Form 8700-12) identifying that you are an eligible academic entity (if you haven't already). Assuming you meet all of the requirements I think you should be able to use one EPA ID# for the campus. I've

attached a website with more information on Subpart K requirements. <http://www.epa.gov/osw/hazard/generation/labwaste/lab-faqs2.htm>

If you need help with the Form 8700-12 you can call (415) 495-8895 to speak with the contractor that handles issuing and updating federal ID numbers for California facilities. They should be able to tell you if you can extend the CAT000617597 number to cover Norris Cancer Hospital or if they need to issue a new EPA ID # that covers the whole campus.

Regards,

Jennifer MacArthur
Enforcement Office
Waste & Chemical Section
US EPA Region 9
75 Hawthorne Street (ENF-2-2)
San Francisco, CA 94105
(415) 972-3994

From: Michelle Lee [<mailto:michelee@usc.edu>]
Sent: Monday, March 09, 2015 2:43 PM
To: 'Chapman, Karen'; 'Vance, Robert'; 'Taylor, Gordon'; MacArthur, Jennifer
Subject: RE: EPA Registry info

Hi Ms. MacArthur,

I work as a university environmental compliance manager, and we consider the Norris Cancer Hospital a part of university campus. University uses a **federal EPA ID# CAT000617597** to manifest/ship off RCRA wastes collected from medical research facilities on Health Science Campus, including Norris Cancer Research Center located in the Norris Cancer Hospital, 1441 Eastlake Avenue, LA, (from 4th floor to 7th floor). University is currently in the process of integrating hospital hazardous wastes management into one university management with one consolidation facility.

Can the Norris Cancer Hospital uses the university federal EPA ID (CAT000617597) to ship off their RCRA wastes?

Please feel free to contact me should you have any question.

Regards,

Michelle Lee, MSEM, CHMM
Environmental Compliance Manager
Environmental Health and Safety
323-864-3188 / michelee@usc.edu



From: Chapman, Karen [<mailto:Karen.Chapman@health.usc.edu>]
Sent: Monday, March 09, 2015 1:39 PM
To: Michelle Lee; Vance, Robert; Taylor, Gordon
Subject: Fwd: EPA Registry info

Kc

Begin forwarded message:

From: "Chapman, Karen" <Karen.Chapman@health.usc.edu>
Date: March 9, 2015 at 11:59:48 AM PDT
To: "macarthur.jennifer@epa.gov" <macarthur.jennifer@epa.gov>
Subject: FW: EPA Registry info

Hi Jennifer,

I sent this to you last month, but I must have gotten your email address incorrect.

Please call me to discuss.

Thank you.

KC

Karen A. Chapman, MHA,MA,CPHRM
Executive Administrator
Environment of Care
Keck Hospital of **USC**
USC Norris Cancer Hospital

Keck Medical Center of **USC**
University of Southern California
1500 San Pablo Street
Los Angeles, California 90033
Office 323 442 8862
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karen.chapman@med.usc.edu

From: Chapman, Karen
Sent: Tuesday, February 17, 2015 11:10 AM
To: Macarthur@epa.gov
Cc: Vance, Robert
Subject: FW: EPA Registry info

Hi Jennifer,

Thank you for your call today. Please see the attached link for the USC Norris Cancer Hospital EPA ID , and let me know if this will fulfill the requirement that we discussed.

http://oaspub.epa.gov/enviro/fii_query_dtl.disp_program_facility?pgm_sys_id_in=CAL000309829&pgm_sys_acrnm_in=BR

Sincerely,

Karen

Karen A. Chapman, MHA,MA,CPHRM
Executive Administrator
Environment of Care
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USC Norris Cancer Hospital

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karen.chapman@med.usc.edu

From: Vance, Robert
Sent: Tuesday, February 17, 2015 11:02 AM
To: Chapman, Karen
Subject: EPA Registry info

http://oaspub.epa.gov/enviro/fii_query_dtl.disp_program_facility?pgm_sys_id_in=CAL000309829&pgm_sys_acrnm_in=BR

Robert C. Vance III, CPP,CHEP
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Yesterdays theories are today's best practices".